

**SUMMARY OF THE PUBLIC COMMENTS RECEIVED ON THE
DRAFT AIR PERMIT CSP 0054-01-C FOR
HAWAIIAN COMMERCIAL AND SUGAR (HC&S) COMPANY
LOCATED AT: PUUNENE SUGAR MILL
Comment Period: March 22 to April 23, 2012**

I. OVERVIEW

Pursuant to the Hawaii Administrative Rules (HAR), Chapter 11-60.1, a public comment period was held from March 22 to April 23, 2012, for the Hawaii Department of Health (HDOH) to receive comments on the draft covered source permit (CSP) No. 0054-01-C. Issuance of the air permit to Hawaiian Commercial and Sugar (HC&S) Company would allow continued operation of three (3) boilers, a rotary sugar dryer, and various diesel engines.

II. SUMMARY OF COMMENTS RECEIVED

- A. During the public comment period the HDOH received:
1. Four (4) written comments;
 2. Two-hundred fifty five (255) identical photocopied letters each signed by different individuals and another fifteen (15) identical photocopied letters each signed by different individuals; and
 3. Three-hundred eighteen (318) emails originating from the same email address, each containing the identical statement in the body of the email, and each from different individuals.

III. COMMENTS AND RESPONSE TO COMMENTS

A. Comment:

Many commenters expressed their opposition to the issuance of CSP No. 0054-01-C until Boiler 3 shows compliance with the Continuous Opacity Monitoring System (COMS) and Continuous Emissions Monitoring System (CEMS) requirements of CFR Part 60, Subpart D.

HDOH Response:

The use of both a COMS and CEMS, as specified in 40 Code of Federal Regulations (CFR), Part 60, Subpart D is not required if an alternate monitoring method has been approved by the administrator. A request for approval of an alternate monitoring method has been proposed by Hawaiian Commercial and Sugar Company. U.S. EPA, Region 9 has approved the use of alternative monitoring, in the form of monitoring wet scrubber operating parameters, in lieu of the requirement to install a COMS. EPA has also allowed an exemption from the requirement to install a NO_x CEMS finding that performance testing of Boiler 3 meets the requirements of 40 CFR Part 60, Subpart D. Although the HC & S request for alternative monitoring in lieu of the installation of an SO₂ CEMS has been approved, the fuel sampling and analysis procedure proposed by HC & S is pending EPA's approval.

The alternative monitoring conditions for PM and NO₂, which HC & S is currently implementing, will be incorporated in a future permit modification. The alternative

monitoring method for SO₂ is pending EPA determination. Due to the uncertainty regarding the determination, the HDOH will address the outcome of the determination in a future permit modification. The modification will be subject to a thirty (30) day public comment period and notice will be published to request for public comments on the modification prior to issuance.

On the subject of the Notice and Finding of Violation, in December 2006, the HDOH and HC&S reached an agreement on a Consent Order (CO). According to the CO, HC&S paid a fine of \$60,000 and began a Supplemental Environmental Project (SEP) with two (2) phases:

- (1) conduct alternative opacity monitoring for Boilers 1 and 2; and
- (2) make improvements to the bagasse delivery system for the Puunene boilers. In July 2007, HC&S notified HDOH that it was already required to implement the monitoring in phase one and therefore could not use it to satisfy the SEP. In September 2007, the SEP was modified to incorporate the funds negotiated for phase one into phase two. The SEP was formally completed and closed in September, 2008. The total SEP expenditure met, or exceeded, the required SEP amount of \$305,000.

B. Comment:

A comment was made regarding the need for air quality monitoring stations in upper Paia, Paia itself and Kihei.

HDOH Response:

Ambient air quality monitoring stations are currently located at Paia, Kihei, and Kahului. All three locations measure fine particulate matter (PM_{2.5}). In the near future the Kahului monitoring station will have the ability to measure SO₂, NO₂, and CO. The data from the monitoring sites can be viewed at:

<http://health.hawaii.gov/cab/hawaii-ambient-air-quality-data/>

C. Comment:

Several commenters request a public hearing for the proposed permit.

HDOH Response:

Although requested by several commenters, a public hearing was not held. Based on the comments submitted during the public comment period, it was determined that holding a public hearing would not provide additional comments that would aid the Department in making its decision.

D. Comment:

Attachment IIA, Special Condition C.1, Boiler Emission Limits Note 3 to Table 1, referring to emission limits applicable to Boilers 1 and 2 during coal firing states: "Stack 1 Boilers 1 and 2 when firing 90% or more of the total heat input". This note

should be clarified to specify that the referenced emissions limits apply only when 90% or more of the total heat input to the boiler(s) is from coal.

HDOH Response:

Table 1 has been revised per comment. Footnote-3, now reads, "Stack 1 Boilers 1 and 2, emission limit applies only when firing 90% or more of the total heat input from coal."

E. Comment:

The emission limit specified in Table 1 for particulate matter emissions from Boiler 3 when firing coal is 0.1 lb/MMBtu. The emission limit specified in 40 CFR §60.42 applicable to Boiler 3 when firing fossil fuel (including coal) or fossil fuel and wood residue is 0.10 lb/MMBtu. Similarly, the emission limit specified in Table 1 for sulfur dioxide emissions from Boiler 3 when firing liquid fossil fuel is 0.8 lb/MMBtu whereas the emission limit specified in 40 CFR §60.43 is 0.80 lb/MMBtu. The number of significant digits specified in the emission limit determines the appropriate protocol for rounding of emissions measurements. HC&S therefore recommends that these emission limits be revised to be consistent with 40 CFR §60.42 and 60.43.

HDOH Response:

The limits have been revised to reflect the proper significant digits. In Attachment IIA, Special Condition C.1, TABLE 1, Boiler Emission Limits, the HDOH corrected the particulate emission limit from 0.1 to 0.10 lb/MMBtu and the sulfur dioxide emission limit from 0.8 to 0.80 lb/MMBtu for consistency with 40 CFR Part 60 §60.42 and Part 60 §60.43, respectively.

F. Comment:

The proposed Special Condition C.1.a.iii is not applicable to the Puunene Mill facility because none of the boilers are permitted to burn coal reuse.

HDOH Response:

The DOH deleted Attachment IIA, Special Condition C.1.a.iii.

G. Comment:

The opacity limit specified in Special Condition C.2.c. for Boiler 3, Stack 2 is inconsistent with opacity limits specified in 40 CFR Part 60 Subparts A and D, and with the opacity limit specified in HAR §60.1-32(b) for sources which commenced construction after March 20, 1972. Specifically, the proposed opacity limit would prohibit stack opacity in excess of 27 percent during periods of startup, shutdown, or malfunction; there is no basis for this new limitation in either 40 CFR Part 60 or in HAR Chapter 11-60.1. The current, and correct, opacity limit for this unit during periods of startup, shutdown, or malfunction is as specified in HAR §60.1-32(b)(2).

Under 40 CFR §60.42(a), affected facilities are prohibited from discharging into the atmosphere any gases that exhibit greater than 20 percent opacity except for one six-

minute period per hour of not more than 27 percent opacity. Under 40 CFR §60.11, however, opacity standards set forth in Part 60, including the standard under §60.42(a), "shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard" (emphasize added). That is, the opacity limits specified under 40 CFR §60.11, including the 27 percent opacity limit, apply during periods of normal operation; 40 CFR Part 60 does not impose a numerical limit on opacity emissions from affected sources during periods of startup, shutdown, or malfunction. Rather, during such periods, owners and operators are simply required, to the extent practicable, to maintain and operate the facility in a manner consistent with good air pollution control practices for minimizing emissions.

The proposal to impose upon Boiler 3 stack new, more restrictive opacity limit of 27 percent during periods of startup, shutdown, or malfunction therefore goes beyond any existing state or federal requirements applicable to this facility and must be revised.

Given that 40 CFR Part 60 does not impose a numerical limit on opacity of emission from affected sources during periods of startup, shutdown, or malfunctions, the appropriate opacity limit for Boiler 3 stack during such periods is as specified in HAR §11-60.1-32(b)(2) for stationary sources which commence construction, modification, or relocation after March 20, 1972. That is, during startup, shutdown, or when breakdown of equipment occurs, the facility is permitted to discharge into the atmosphere, for period of aggregating not more than six minutes in any sixty minutes, emissions of a density not greater than sixty percent opacity.

It should be noted that the opacity limit specified in 40 CFR §60.42(a) is actually less stringent than the opacity limit specified in HAR §11-60.1-32(b)(2) because the latter provision imposes an opacity limit during periods of startup, shutdown, and malfunction whereas the former imposes no numerical limit during period of startup, shutdown, and malfunction and also a higher opacity (27 percent) during normal operations for up to six minutes out of every hour. As such, the opacity limit specified for Boiler 3 in the permit should be more stringent of these two limits. The opacity limit specified for Boiler 3 in the draft permit, however, is actually a hybrid of the two limits and is more stringent than either the limit specified in 40 CFR §60.42(a) or the limit specified in HAR §11-60.1-32(b)(2). As indicated above, there is therefore no basis in either state or federal regulation for this proposed limit.

HC&S requests that the proposed Special Condition C.2.c. be revised to read as follows, consistent with applicable requirements under state and federal regulations:

- c. Boiler 3, Stack 2 shall not exhibit visible emissions of a density equal to or darker than twenty (20) percent opacity for any six (6) minute averaging period except that during startup, shutdown, or when breakdown of equipment occurs Stack 2 may exhibit visible emissions greater than twenty (20) percent opacity but not exceeding sixty (60) percent opacity for a period aggregating not more than six (6) minutes in any sixty (60) minute period.

HDOH Response:

The draft condition has been revised pursuant to comment.

H. Comment:

Attachment IIA, Special Condition C.2, Boiler Opacity of Visible Emissions

Both Puunene Mill stacks are equipped with wet scrubbers which emit water vapor during normal operation. Therefore, consistent with HAR §11-60.1(d), a new Special Condition C.2.d should be added to the permit clarifying that emissions of uncombined water, such as water vapor, are exempt from the provisions of Special Conditions C.2.a through C.2.c and do not constitute an opacity violation.

HDOH Response:

All visible emission readings are to be done in accordance with 40 CFR Part 60, Appendix A, Method 9. The proper location within the exhaust plume to measure opacity is identified in Method 9, and will not be added to the permit.

I. Comment:

Attachment IIA, Special Condition D.2, Biomass

The proposed Special Condition D.2.b specifies requirements for the bagasse handling system servicing the Puunene Mill boilers that are consistent with the Supplemental Environmental Project completed under the Consent Order in the case of Docket Number 01-CA-EO-8. This condition requires that at least half of the Boiler 3 bagasse feeders must be fed directly from the return belt conveyor (6072), except that under Special Condition D.2.b.v the bagasse conveyor system may be operated with all three boilers being fed directly from the mill in the event that a system failure temporarily prevents feeding bagasse from the bagasse house.

During certain periods of normal operation there may be insufficient bagasse in the bagasse house to supply half of the bagasse required to fuel Boiler 3. For example, during and for a period of time after mill startup, there may be little or no bagasse in storage in the bagasse house available to be fed to the boilers via the 6072 conveyor. HC&S therefore requests that Special Condition D.2.b.v be revised to read as follows:

"The bagasse conveyor system may be operated with all three (3) boilers being fed directly from the mill in the event that a system failure temporarily prevents feeding bagasse from the bagasse house, or during periods when there is insufficient bagasse accumulated in the bagasse house to provide an adequate supply of bagasse to Boiler 3 via the return belt conveyor."

HDOH Response:

At the end of Attachment IIA.D.2.b.v., the HDOH has added:

"or during periods when there is insufficient bagasse accumulated in the bagasse house to provide an adequate supply of bagasse to Boiler 3 via the return belt conveyor."

J. Comment:

Attachment IIA, Special Condition D.3, Coal

The proposed Special Condition D.3.a. and D.3.b. impose new restrictions on coal firing in Boilers 1 and 2 and in Boiler 3 by changing the existing annual limits on coal consumption to rolling 12-month limits. The revised limits on coal use in all three Puunene Mill boilers will limit the facilities operational flexibility to manage off-season maintenance projects and boiler outages for repairs.

The Puunene Sugar Mill typically grinds sugarcane for eight to nine months of each year with an off-season period of three to four months for maintenance and repairs to the mill, boiling house and power plant. During the off-season period, which runs from the end of the calendar year through the beginning of the following calendar year, one or more of the boilers will be shut down for maintenance at any given time. Because the mill is not operating and bagasse is not being produced during the off-season period, the operating boiler(s) will be fueled primarily on coal during the off-season, and a substantial amount of each boiler's annual coal consumption can occur during this period. Depending upon repair and maintenance priorities, the schedule for boiler outages may shift from year to year, and it is possible for a boiler to take its outage during different periods from year to year. In addition, depending upon crop yields, weather, equipment breakdowns, and other factors, the beginning and end of the off-season period can shift from year to year. All of these factors could contribute to boiler coal consumption during any rolling 12-month period being much higher than coal consumption in the same boiler during the overlapping calendar year periods (as an example, combined annual coal consumption in Boilers 1 and 2 during both the 2010 and 2011 calendar years was less than 30,000 tons, while the highest 12-month rolling average of coal consumption in these boilers during 2010 was in excess of 50,000 tons, owing primarily to historically low sugar yields during 2009). As such, the revised limits on coal consumption in the Puunene Mill boilers will greatly complicate scheduling of the annual off-season maintenance periods and may prevent HC&S from operating one or more boilers during a portion of the off-season even when the existing annual limit on coal consumption is being complied with.

For these reasons, HC&S requests that the existing annual (calendar year) limits on coal consumption in the Puunene Mill boilers be retained in the Covered Source Permit in lieu of the proposed new rolling twelve-month limits.

HDOH Response:

The monitoring method requiring that annual compliance be determined by using a rolling 12-month average is the standard method used to demonstrate compliance with an annual limit and will not be revised. If the applicant cannot meet their self-proposed limits, the limit should be increased by permit modification.

K. Comment:

Attachment IIA, Special Condition D.3, Coal

The proposed Special Condition D.3.c requires that each shipment of coal received at the facility must be sampled and tested for its heating value and sulfur content, and that each sample shall be representative of all the coal included in the shipment. The

proposed Special Condition D.3.d. requires that coal fired in the boilers shall be low sulfur coal with a maximum sulfur content not to exceed 0.5 percent by weight. Per the proposed Special Condition D.5.a, compliance with the coal sulfur limit is to be determined based upon analysis of the coal sample required under the proposed Special Condition D.3.c. For consistency between Special Conditions D.5.a and D.3.d, HC&S therefore request that the proposed Special Condition D.3.d be revised to read as follows:

- d. Coal fired in the boilers shall be washed, low sulfur coal with maximum sulfur content, as determined in accordance with Special Condition D.3.c, not to exceed 0.5% by weight.

HDOH Response:

Attachment IIA, special condition D.3.c will remain unchanged. For permit consistency, permit condition D.5.a will be revised to read as follows: "All coal burned in the three (3) boilers shall have a maximum sulfur content not to exceed 0.5% by weight." Due to the uncertainty regarding how sulfur in coal is to be monitored, all references to how the sulfur content will be monitored will be kept separate from permitted limits.

L. Comment:

Attachment IIA. Special Condition D.3. Coal

The proposed Special Condition D.3.i states that the transferring of coal to any other facility is prohibited without first notifying the Department of Health in writing, "well in advance of such transfer". HC&S recommends specifying a time frame for this written notification (e.g., 10 days in advance of such transfer), since the phrase "well in advance" is ambiguous and may be subject to differing interpretations.

HDOH Response:

The HDOH replaced "well" with "ten (10) days".

M. Comment:

Attachment IIA, Special Condition D.4.c refers to "in-house facility specification used oil for Boiler 3" and states that "Boiler 3 shall burn only in-house provided used oil". Table 2 in the proposed Special Condition D.4.f also indicates that used oil burned in Boiler 3 shall be in-house used oil only.

The existing approval to burn specification used oil in the Puunene Mill boilers (dated November 8, 2007) allows the combustion of both commercially supplied and in-house generated used oil in all three boilers, and HC&S has been burning commercially supplied used oil in Boiler 3 for several years. There is no difference between specification used oil generated in-house and that obtained from commercial suppliers in terms of contaminant levels and resulting emissions, and the permit does not impose a limit on the quantity of used oil that can be burned in Boiler 3 other than the combined 2,000,000 gallon combined limit for all three boilers. Accordingly, there

does not appear to be any basis for the proposed new requirement limiting the burning of used oil in Boiler 3 to in-house generated used oil only.

HC&S requests that the proposed provisions of Special Conditions D.4.c and D.4.f (Table 2) limiting used oil combustion in Boiler 3 to in-house generated oil only be deleted, and that the existing ability to burn both in-house and commercially generated oil in all three boilers be retained in the Covered Source Permit.

Since both in-house and commercially generated used oil are burned in Boilers 1 and 2, HC&S also recommends revising the first sentence of Special Condition D.4.c to read as follows:

- d. For in-house facility specification used oil, the used oil shall consist of lubricating oil, diesel fuel, kerosene, hydraulic oils, grease, and non-PCB transformer mineral oil.

As written, this condition would apply to in-house generated used oil burned in Boiler 3 but not to in-house generated used oil burned in Boilers 1 and 2.

HDOH Response:

The phrase "for Boiler 3" in Special Condition D.4.c. has been removed from the first sentence and the second sentence has been removed in its entirety. In Special Condition D.4.f., in Table 2-Specification Used Oil, the HDOH has deleted "in-house only", and "commercial source only".

N. Comment:

Attachment IIA, Special Condition D.4, Specification Used Oil

There is a typographical error in formatting of the proposed Special Conditions D.4.g and D.4.h. Special Condition D.4.h appears to begin in the middle sentence ("h. shall be identified and isolated from the non-contaminated containers. In no case shall . . .).

HDOH Response:

Special Condition D.4. of the Draft permit contains typographical errors, the permit conditions were re-lettered to correct the error.

In Special Condition D.4.h of the revised permit, "HC&S" was removed and replaced by "an independent certified laboratory".

In Special Condition D.4.i of the revised permit the condition was revised from: "2,000,000 gallons on a twelve-month (12-month) rolling basis", to "2,000,000 gallons on a rolling twelve-month (12-month) basis."

O. Attachment IIA, Special Condition D.4, Specification Used Oil

The proposed Special Condition D.4.i allows fuel blending with fuel oil no. 2 to meet the requirements of Table 2 under specified conditions. It is also possible to meet the requirements of Table 2 by blending used oil which does not meet the specifications

with other used oil which does meet the specifications (for example, used oil containing 0.8 percent sulfur content by weight can be blended with an equal amount of used oil containing 0.5 percent sulfur content to meet the specification for burning in Boilers 1 and 2). HC&S therefore requests that the proposed Special Condition D.4.i be revised and clarified as follows:

- i. Used oil which exceeds the limits specified in Table 2 above and which has not been determined to be a hazardous waste may be blended with fuel oil no. 2 or with other specification used oil to meet the requirements of Table 2. If fuel blending is used to meet the requirements of Table 2, HC&S shall retest or perform calculations to verify that the blended fuel meets these requirements. Used oil fuel blended with fuel oil no. 2 and meeting the requirements of Table 2 is considered specification used oil.

HDOH Response:

The condition will not be revised. Only fuel blending with fuel oil no. 2 is allowed.

P. Comment:

Attachment IIA, Special Condition D.6, Boiler Multicyclones and Venturi Wet Scrubbers

The proposed Special Condition D.6.a requires that all exhaust gases from Boilers 1 and 2 "shall be ducted through each multicyclone dust collector and a venturi wet scrubber system before exiting through Stack 1". As written, this provision would inadvertently require that exhaust gas emissions from Boiler 1 be ducted through both the Boiler 1 and Boiler 2 multicyclone dust collector, and the same for Boiler 2. Since it is not possible for emissions from either boiler to be ducted through the multicyclone dust collector serving the other boiler, the proposed Special Condition D.6.a should be revised to read as follows:

- a. At all times, when Boiler 1 and/or Boiler 2 are operating firing any fuel, all exhaust gases from each boiler shall be ducted through the respective multicyclone dust collector and through a venturi wet scrubber before exiting through Stack 1.

HDOH Response:

The HDOH reworded the above section as follows: "... all exhaust gases from each boiler shall be ducted through the respective multicyclone dust collector and venturi wet scrubber..."

Q. Comment:

Attachment IIA, Special Condition D.7, Sugar Dryer

The proposed Special Condition D.7 requires that the amount of specialty sugar dried shall not exceed 75,000 tons during any rolling twelve-month period. In addition to the 20,000 lb/hr FEECO sugar dryer, HC&S operates a smaller sugar granulator (dryer) which was determined by the Department of Health to be an insignificant activity. No operating limit on the quantity of sugar dried has been specified for the granulator. In order to clarify that the 75,000 tons per year limit applies only to sugar dried in the

FEECO unit and not to all sugar dried at the facility, HC&S request that Special Condition D.7 be revised to read as follows:

"The amount of specialty sugar dried in the 20,000 lb/hr sugar dryer shall not exceed 75,000 tons during any rolling twelve month (12-month) period."

HDOH Response:

The permit condition has been revised per your comment.

R. Comment:

Attachment IIA, Special Condition E.2, Boiler Fuel Consumption and Analysis Records

The proposed Special Condition E.2.c.iii.(5) requires the installation of "non-resetting fuel meters on all three boilers for the continuous and permanent recording of the number of gallons of specification used oil fired in each boiler for the purpose of the gallon limitation specified in this Attachment, Special Condition D.4.i.

Rather than referring to Special Condition D.4.i., the proposed provision should refer to Special Condition D.4.j, which limits the quantity of used oil consumed in all three boilers (combined) to no more than 2,000,000 gallons per year. (Special Condition D.4.i relates to blending of used oil with fuel oil no.2.)

HDOH Response:

Special Condition D.4. of the revised permit was re-lettered. Special Condition E.2.c.iii.(5) of the revised permit now references the correct permit condition.

S. Comment:

The existing facility fuel oil storage tank system is comprised of nine storage tanks. Six storage tanks are used for storage of specification used oil to be burned in Boilers 1 and 2; these tanks are piped to Boilers 1 and 2 through a common supply line. Two storage tanks are used for storage of specification used oil to be burned in Boiler 3; these tanks are piped to Boiler 3 through a dedicated supply line. One tank is used for storage of fuel oil no.2 to be burned in any of the three boilers; this tank is normally kept isolated but may be piped to either Boilers 1 and 2, to Boiler 3, or to all three boilers using the same piping that supplies specification used oil fuel to the boilers. Each of the three boilers is currently equipped with an electronic fuel oil meter located upstream of the oil burners. Because both fuel oil no. 2 and specification used oil are supplied to the boilers through the same piping, these meters record all fuel oil supplied to the boilers and cannot differentiate between used oil and fuel oil. Currently, annual consumption of fuel oil no. 2 in the boilers is monitored by recording fuel oil meter readings at the time that the fuel oil tank is placed in service and removed from service and by ensuring that fuel oil no. 2 and specification used oil are not burned simultaneously in any boiler. In addition, because these flow meters are electronic, they cannot be readily configured to be "non-resettable."

Since it would be necessary to completely re-pipe the fuel oil system from the fuel oil storage tanks to the boilers in order to allow direct monitoring of specification used oil

separately from fuel oil no. 2 in each boiler, HC&S proposes an alternative solution to demonstrate compliance with the limitation on specification used oil consumption. Rather than installing a non-resetting fuel oil meter on all three boilers, HC&S proposes to install a non-resetting fuel oil meter on the combined fuel line supplying Boilers 1 and 2, a second non-resetting fuel oil meter on the combined fuel line supplying Boiler 3, and a third non-resetting fuel oil meter on the fuel line from the shared fuel oil no. 2 tank. The first two meters would record all fuel oil (specification used oil fuel and fuel oil no. 2) burned in the respective boilers, while the third meter would record only fuel oil no. 2 burned in the boilers. By subtracting the reading on the third meter from the sum of the readings on the first two meters, the quantity of specification used oil burned in all three boilers can be determined for comparison with the limit specified in Special Condition D.4.j (note that Special Condition D.4.j limits the combined specification used oil consumption in all three boilers; it does not limit used oil consumption in individual boilers). For the purposes of annual emission reporting, the existing electronic fuel oil meters would continue to be used to determine total fuel oil consumption individually in Boiler 1 and Boiler 2.

HDOH Response:

Attachment II, Special Condition E.2.c.iii.5) is revised to allow the permittee to submit for the Department's approval a written request for an alternative to the installation of three (3) non-resetting fuel meters on each of the three (3) boilers for the purpose of accurately monitoring specification used oil consumption in Boilers 1, 2, and 3.

T. Comment:

HC&S requests that the proposed Special Condition E.2.c.iii.(5) be revised to allow this alternate monitoring scenario, or to allow other monitoring alternatives as approved by the HDOH.

HDOH Response:

See previous HDOH response.

U. Comment:

Since non-resetting fuel oil meters are not currently installed on the boiler fuel oil system, HC&S also request that Special Condition E.2.c.iii.(5) be revised to specify a period of time from issuance of the Covered Source Permit by which the new meters must be installed and made operational.

HDOH Response:

The following revision has been added as the opening statement to Attachment IIA.E.2.c.iii.(5): "Within sixty (60) days after the issuance date of this permit," . . .

Also, the following has been added as the last statement of Attachment IIA.E.2.c.iii.(5): "Upon written request by the permittee, the deadline for installing the non-resetting fuel meters on each of the three boilers may be extended if the HDOH determines that reasonable justification exists for the extension."

V. Comment:

HC&S also suggests that the reference to "the non-resetting hour meter" in the second paragraph of Special Condition E.2.c.ii.(5) should be changed to refer instead to "the non-resetting fuel meter".

HDOH Response:

The permit condition has been revised per comment.

W. Comment:

Attachment IIA, Special Condition E.3, Sugar Dryer

The proposed Special Condition E.3.b requires that the permittee continuously monitor and record the amount of specialty sugar dried on a daily basis. As discussed above, in addition to the 20,000 lb/hr FEECO sugar dryer, HC&S operates a smaller sugar granulator (dryer) which has been determined by the Department of Health to be an insignificant activity; tracking of sugar dried in the sugar granulator is therefore not currently required. In order to clarify that the requirement to monitor the quantity of sugar dried applies only to sugar dried in the FEECO unit rather than to all sugar dried at the facility, HC&S requests that Special Condition E.4 be revised to read as follows:

"The permittee shall continuously monitor and record the amount of specialty sugar dried in the 20,000 lb/hr sugar dryer on a daily basis. Any sugar dried and rejected prior to packaging shall also be included when calculating the amount of specialty sugar dried. Records shall also be maintained on the amount of specialty sugar dried in the 20,000 lb/hr sugar dryer per month and for the previous rolling twelve-month (12-month) period."

HDOH Response:

The condition has been revised per request.

Comment:

Attachment IIA, Special Condition E.6, Boiler 3, 40 CFR Part 60, Subpart D

The proposed special condition requires installation of a COMS and a CEMS on the Boiler 3 stack "within 60 days after the issuance date of this permit, but not later than 180 days after issuance of this permit. As written, this provision would require that COMS and CEMS be installed within 60 days after the issuance date of this permit. Assuming that CEMS and/or COMS are required to be installed on Boiler 3 stack, it would not be feasible to install these systems within the time period allowed. Accordingly, a longer time period to complete these installations is requested. HC&S has proposed in its compliance plan for Boiler 3 that CEMS would be installed on the boiler 3 stack within one year after determining that CEMS is required (i.e., after determining that exemptions from CEMS, as described below, are not applicable to Boiler 3).

X. HDOH Response:

The revised version of Attachment IIA.E.6. is as follows:

"Unless an alternate monitoring plan is approved by U.S. EPA region 9, and as provided in this Attachment, Special Condition E.7, on Boiler 3, Stack 2, the permittee shall install, operate, calibrate, and maintain a continuous opacity monitoring system (COMS) for measuring opacity and a continuous emissions monitoring system (CEMS) for measuring sulfur dioxide (SO₂) emissions, nitrogen oxide (NO_x) emissions, and either oxygen (O₂) or carbon dioxide (CO₂) emissions."

Y. Comment:

As indicated in the proposed Special Condition E.21, 40 CFR Part 60 allows a facility to request approval for alternative monitoring requirements when installation of a continuous monitoring system specified by Part 60 will not provide accurate measurements due to liquid water or other interferences caused by substances in the effluent gases. A COMS will not provide an accurate measurement of opacity on a stack with a wet scrubber due to water vapor plume present in the stack, and wet scrubbers are installed on both boiler stacks at the Puunene Mill.

In March 2002, shortly after HC&S determined that Boiler 3 was subject to the NSPS, HC&S submitted to the Director, Air Division, U.S. EPA Region 9 and to the Department of Health a request for approval of alternate monitoring for opacity. The Department of Health in February 2004 requested comment from EPA on this proposal. Pending formal approval of the proposed monitoring procedure, HC&S installed equipment to monitor and record wet scrubber operations parameters, as required by the proposed procedure, and implemented the procedure. HC&S subsequently submitted additional information modifying the proposed alternative opacity monitoring procedure, and has been following this plan since its implementation, including making regular reports of monitoring system operations to the Department. To date, there has been no response either approving or disapproving of the proposed alternate opacity monitoring procedure. Since a continuous opacity monitoring system will not function properly in a stack with a wet scrubber due to the water vapor plume, HC&S believes that the proposed procedure will eventually be approved; however, in the event that it will not be approved an alternative monitoring requirement would need to be submitted for approval.

HDOH Response:

The alternate monitoring methods to be used for opacity were not presented in the permit which the public provided comments. Therefore, changes in the method used to monitor will be addressed in a forthcoming permit modification. The Department respectfully requests that all comments regarding approved alternate monitoring procedures be addressed during the comment period for the permit modification.

Z. Comment:

As reflected in the proposed Special Condition E.7.b, 40 CFR Part 60, Subpart D, also allows a facility which does not use flue gas desulfurization system to monitor fuel sulfur content as an alternative to installation of CEMS for monitoring SO₂ emissions.

Shortly after it was determined that Boiler 3 was subject to NSPS, HC&S submitted to both the Department and to EPA a revised covered source permit application that incorporated a request for approval of fuel sulfur analysis (FSA) programs for both coal and fuel oil. Subsequently, HC&S submitted to the Department and to EPA more detailed information in support of the request. The proposed FSA program for fuel oil was implemented pending approval, and HC&S has been adhering to this program ever since, including submitting regular reports to the Department. The proposed FSA program for coal requires a capital investment for regular sampling of coal and for sample preparation. Therefore, an interim FSA for coal was also proposed. The interim FSA for coal was implemented pending approval, and HC&S has been adhering to this program ever since, including submitting regular reports to the Department. HC&S and its consultant have had several discussions regarding this issue with both the Department and with EPA, and it is our understanding that since February 2004 a request for determination from the Department regarding the requirement for CEMS on Boiler 3 stack has been pending with EPA Region 9, Air Division.

HDOH Response:

The alternate monitoring methods to be used for SO₂ were not presented in the permit which the public provided comments. Therefore, changes in the method used to monitor will be addressed in a forthcoming permit modification. The Department respectfully requests that all comments regarding approved alternate monitoring procedures be addressed during the comment period for the permit modification.

AA. Comment:

As reflected in the proposed Special Condition E.7.c, 40 CFR Part 60, Subpart D also provides that a facility which demonstrates that emission of nitrogen oxides from fossil fuel firing are less than 70% of the applicable NSPS emission limits is not required to install a CEMS for monitoring NO_x emissions. HC&S has repeatedly demonstrated through annual stack testing that emissions of nitrogen oxides from Boiler 3 during both coal firing and fuel oil firing are less than 70% of the applicable emission limits. Shortly after it was determined that Boiler 3 was subject to the NSPS, HC&S advised the Department of its understanding that the facility is exempt from the requirements to install CEMS for monitoring NO_x emissions. HC&S and its consultants have had several discussions regarding this issue with both the Department and with EPA, and in April 2003 HC&S submitted to the Department and to EPA additional detailed information in support of its determination. It is our understanding that since February 2004 a request for determination from the Department regarding the requirement for CEMS on the Boiler 3 stack has been pending with EPA Region 9, Air Division.

HDOH Response:

The alternate monitoring methods to be used for NO_x were not presented in the permit which the public provided comments. Therefore, changes in the method used to monitor will be addressed in a forthcoming permit modification. The Department respectfully requests that all comments regarding approved alternate monitoring procedures be addressed during the comment period for the permit modification.

BB. Comment:

In light of the amount of time required to specify, receive quotations, contract, and complete installation of these complex monitoring systems, HC&S believes that the 60 days provided for their installation in the proposed Special Conditions E.6. is inadequate. In addition, given that requests for determinations regarding alternate monitoring of opacity and installation of CEMS on the Boiler 3 stack remain pending with the Department and EPA, HC&S believes that the time period allotted for installation of these systems, should they be required, should begin on the date that a final determination is made regarding the need to install CEMS and/or COMS on the Boiler 3 stack.

HDOH Response:

As stated in a previous comment regarding Attachment IIA, special condition E.6, the condition has been revised to read:

“Unless an alternate monitoring plan is approved by U.S. EPA region 9, and as provided in this Attachment, Special Condition E.7, on Boiler 3, Stack 2, the permittee shall install, operate, calibrate, and maintain a continuous opacity monitoring system (COMS) for measuring opacity and a continuous emissions monitoring system (CEMS) for measuring sulfur dioxide (SO₂) emissions, nitrogen oxide (NO_x) emissions, and either oxygen (O₂) or carbon dioxide (CO₂) emissions.”

CC. Comment:

Attachment IIA, Special Condition E.7

The proposed Special Condition E.7 provides that, with a written request to and written approval from the Administrator of U.S. EPA Region 9, certain of the CEMS requirements specified under the proposed Special Condition E.6 shall not apply. The proposed condition is based upon 40 CFR §60.45(b), which states, “Certain of the CEMS requirements under paragraph (a) of this section do not apply to owners and operators under the following conditions:”. Importantly, with the exception of the installation of a PM CEMS as an alternative to the CEMS for monitoring opacity emissions (§60.45(b)(5)), none of the exceptions listed under 40 CFR §60.45(b) requires a written approval from the EPA Administrator; as such, it appears that these exceptions are intended to be self-implementing.

For consistency with the underlying federal requirement at 40 CFR §60.45(b), HC&S recommends that Special Condition E.7 be revised to read as follows:

“Certain of the CEMS requirements under paragraph 7 above do not apply to the permittee under the following conditions: Whether or not formal approval is required under 40 CFR §60.45(b), HC&S intends to continue to seek concurrence from the EPA Administrator regarding CEMS requirements applicable to Boiler 3.

HDOH Response:

The condition has been revised according to comment, with the exception that “paragraph 7” has been replaced with “this Attachment, Special Condition E.6” to refer to the proper permit condition. The condition now states:

“U.S. EPA, Region 9, Air Standard Delegation; specifies certain CEMS requirements given in this Attachment, Special Condition E.6 do not apply to the permittee under the following conditions:”

DD. Comment:

Attachment IIA, Special Condition E.10

The proposed Special Condition E.10 specifies values to be used in the equations under Special Condition E.9 to convert CEMS continuous monitoring data into units of the applicable emission standards (lb/MMBtu). Special Condition E.10.f provides a method for determining prorated F or Fc factors to be used to calculate emissions when firing multiple fuels. Special Condition E.10 does not, however, specify a method for determining the emissions from fossil fuels when firing fossil fuels in combination with bagasse.

40 CFR Part 60, Subpart D specifies emission limits applicable to Boiler 3 when firing fossil fuels alone or in combustion with wood residue. When determining compliance with an emission limit during firing of fossil fuels in combination with bagasse, however, only the emissions and heat input from firing fossil fuels are permitted to be counted under Subpart D. Because a CEMS will measure the total amount of NOx or SO2 in the stack gas from all fuels being fired, it is necessary to subtract from the measured emissions that portion of those emissions that resulted from combustion of bagasse, and to compare the remainder to the appropriate emission limit. If emissions from bagasse firing are not subtracted from the total stack emissions, then the reported emissions from fossil fuels firing will differ from the actual emissions from fossil fuel firing and may result in an erroneous compliance determination, particularly for emissions of NOx. The draft permit does not specify the methodology by which this calculation is to be made.

It should be noted that the methodology for making this calculation is complex, and requires the use of a default factor representing “typical” emissions from bagasse firing. Due to the highly variable nature of this fuel, however, emissions of NOx from firing bagasse can vary widely with fuel quality (i.e., fuel moisture content and corresponding heating value). In addition, due to the nature of operation of a sugar mill, where bagasse fuel is fed directly from the milling process into the boilers, bagasse fuel quality can vary considerably over short periods of time. As such, actual NOx emissions from bagasse firing may vary significantly from NOx emissions that would be estimated using default factors, potentially resulting in wildly erroneous compliance determinations. These difficulties in accurately measuring NOx emissions from bagasse firing using a CEMS were identified in the April 2003 Request for Approval of Alternatives to CEMS submitted by HC&S to the Department and to EPA, and remain a serious concern with respect to the validity of CEMS-based compliance determinations made during periods when bagasse is fired in combination with fossil fuels. HC&S therefore strongly encourages the Department to consider whether CEMS can in fact provide an accurate indication of compliance with 40 CFR Part 60, Subpart D emission limits when bagasse is fired in combination with fossil fuels.

In the event that CEMS is eventually required for monitoring of emissions of NOx and SO2 from Boiler 3, the permit should identify the appropriate methodology for converting CEMS data collected during co-firing of bagasse with fossil fuels into the

corresponding rates of emissions (in lb/MMBTU) resulting from combustion of fossil fuels only.

HDOH Response:

The issues regarding proposed alternate monitoring requirements will be addressed in a future permit modification. Prior to issuing the modification, the public will be allowed to comment.

EE. Comment:

Attachment IIA, Special Condition E.11

The first paragraph of the proposed special condition appears to have typographical errors which render it incoherent. HC&S recommends revising the language of this condition for clarity.

HDOH Response:

Attachment IIA, Special Condition E.11. is revised for clarity.

FF. Comment:

Attachment IIA, Special Condition E.23

The proposed special condition requires records to be maintained regarding periods of Boiler 3 "wet scrubber monitoring system downtime". However the permit does not specify any requirements for the installation and operation of a wet scrubber monitoring system, nor does it identify what parameters are to be monitored with the exception of the requirement under Special Condition D.6 (applicable to both the Boiler 3 and the Boilers 1 and 2 wet scrubber) to install a water pressure gage in the main water line servicing the spray bars. It is therefore unclear to what "wet scrubber monitoring system" this condition applies.

The proposed special condition appears to be a remnant of the alternate opacity monitoring procedure that was part of an earlier draft of the permit. Since the alternate opacity monitoring procedure is not being incorporated into the draft permit at this time, no requirement for the installation of a "wet scrubber monitoring system" exists. HC&S therefore recommends that the proposed Special Condition E.23 be deleted from the permit until such time as an alternate opacity monitoring system is approved. If not deleted, this condition should be revised so that it is clear what scrubber "monitoring system" it applies to.

HDOH Response:

Any approved alternate monitoring system will be addressed in a future permit modification. Monitoring parameters and recordkeeping requirements for the wet scrubber will be incorporated into the permit at that time. Attachment IIA, Special Condition E.23 has been removed from the permit.

Attachment IIA, Special Condition E.24 of the revised permit is renumbered E.23.

GG. Comment:

Attachment IIA, Special Condition E.24, Start-up, Shut-down, and Equipment Malfunction or Breakdown

The proposed Special Condition E.24.c.ii requires records to be maintained regarding periods of Boiler 3 "monitoring device downtime (periods where the monitoring is inoperative and the scrubber remains in operation)". It is not clear to what "monitoring device" this provision refers, as the permit does not include any requirements for the installation and operation of a wet scrubber "monitoring device" this provision refers, as the permit does not include any requirements for the installation and operation of a wet scrubber "monitoring device", nor does it identify what parameters are to be monitored with the exception of the requirement under Special Condition D.6 (applicable to both the Boiler 3 and the Boilers 1 and 2 wet scrubber) to install a water pressure gage in the main water line servicing the spray bars.

The proposed special condition appears to be a remnant of the alternate opacity monitoring procedure that was part of an earlier draft of the permit. Since the alternate opacity monitoring procedure is not being incorporated into the draft permit at this time, no requirement for the installation of a "wet scrubber monitoring device" exists. HC&S therefore recommends the proposed Special Condition E.24.c.ii be deleted from the permit until such a time as an alternate opacity monitoring procedure is approved. If not deleted, this provision should be revised so that it is clear what wet scrubber "monitoring device" it applies to.

HDOH Response:

See previous comment. Attachment IIA, Special Condition E.24 of the revised permit is renumbered E.23. Special condition E.23 of the revised permit requires the permittee to record the reason for wet scrubber downtime, whether downtime is due to system malfunction or other identified cause, and the measure to be taken to return the wet scrubber to operation.

HH. Comment:

Attachment IIA, Special Condition E.25

There appears to be typographical errors in this proposed special condition which render it unclear. For example, the first sentence does not specify what action is required with respect to the items listed. HC&S recommends that this requirement be clarified.

HDOH Response:

The permittee is required to demonstrate compliance with the emission limits of Attachment IIA, Special Condition C.1. through source performance testing. A forthcoming permit modification will address alternative monitoring requirements. Attachment IIA. Special Condition E. 25. of the Draft permit has been deleted.

II. Comment:

Attachment IIA, Special Condition F.12

Under the proposed Special Condition F.12.e, "each excess emission and MSP report shall include the information required in §60.7(c) or F". It is unclear what "F" refers to in this provision. HC&S recommends that this requirement be clarified.

HDOH Response:

"or F" has been deleted.

JJ. Comment:

The proposed Special Condition F.12.e.v.(1)(c) defines excess emissions with respect to opacity of Boiler 3 stack. As discussed in Comment #2 above, the opacity limit specified in Special Condition C.2.c. for Boiler 3, Stack 2 is inconsistent with opacity limits specified in 40 CFR Part 60 Subparts A and D, and with opacity limits specified in HAR §60.1-32(b) for sources which commenced construction after March 20, 1972. HC&S recommends that the definition of excess emissions under this special condition be revised consistent with the earlier comment on Boiler 3 opacity limits.

HDOH Response:

The opacity limits have been revised. Note that the condition has been renumbered and is now Special Condition F.12.e.v.(1)(a)

KK. Comment:

Attachment IIA. Special Condition F.12

The proposed Special Condition F.12.e.v.(1) specifies periods of excess emissions and monitoring system downtime that shall be reported for opacity COMS. The proposed Special Conditions F.12.e.v.(1)(a) and (b) would apply to Boilers 1 and 2 (Stack 1). However, no COMS is required to be installed on Boilers 1 and 2. These units are not subject to 40 CFR Part 60 Subpart D, and requirements originating under Subpart D (including these requirements from 40 CFR §60.45(g)) should not be applied to these units in the permit.

The proposed Special Conditions F.12.e.v.(1)(a) and (b) should be deleted. HC&S also recommends that clarification be added a Special Condition F.12.e, Excess Emissions that provisions under this condition apply only to Boiler 3.

HDOH Response:

Attachment IIA, Special Conditions.F.12.e.v.(1)(a) and (b) have been deleted. Also, "For boiler 3" has been added to the beginning of Special Condition f.12.e for clarification.

LL. Comment:

Attachment IIA, Special Condition F.12

The proposed Special Condition F.12.e.v.(2)(a) and (b) appear to have typographical errors. As written, the three hour averaging period under Special Condition F.12.e.v.(2)(a) would apply when electing not to comply with Table 1, or Special Condition C.1.ii. or 40 CFR §60.43(d). Boiler 3 is required to comply with either the sulfur dioxide emission in Table 1 or with the alternate emission limit under Special Condition C.1.ii (equivalent to that specified in 60.43 (d)) Therefore, there is no condition under which the permittee could elect not to comply with Table 1, or Special Condition C.1.ii, or 40 CFR §60.43(d). Thus, as written, Special Conditions F.12.e.v.(2)(a) would never apply for the purposes of defining excess emissions of sulfur dioxide (in reality, it is anticipated that HC&S will comply with the sulfur dioxide emission limit in Table 1 and that excess emissions will in fact be determined using the three-hour averaging period). Similarly, since the permittee must elect to comply with either the sulfur dioxide emission limit in Table 1 or with the alternate limit under Special Condition C.1.ii.(equivalent to that specified in §60.43 (d)), as written the 30-day averaging period under Special Condition F.12.e.v.(2)(b) would always apply for the purposes of defining excess emissions of sulfur dioxide.

As written, the proposed special conditions are inconsistent with 40 CFR §60.45(g)(2) and it is unclear when, if ever, Special Conditions F.12.e.v.(2)(a) would apply. In addition, "C.1.ii" referenced in these two special conditions does not exist in the permit; the reference should instead be to "C.1.a.ii". HC&S recommends that the Department revise these special conditions for clarity and for consistency with 40 CFR §60.45(g)(2).

HDOH Response:

Attachment IIA. Special Condition F.12.e.v.(2) is revised for consistency with 40 CFR § 60.45(g)(2).

MM. Comment:

Attachment IIA, Special Condition F.12

The proposed Special Condition F.12.e.v.(3) appears to have numerous typographical errors. Specifically, reference is made to "C.1.b.ii, which relates not to the emission limit for nitrogen oxides but rather to how the emission limit is to be prorated when firing different fuel simultaneously; the correct reference here may be "C.1.a.iv". In addition, reference is made to C.1.b.ii; orii"; it is unclear to what "orii" refers. Lastly, as written the three hour averaging period for defining excess emissions of nitrogen oxides would apply when electing not to comply with Table 1, or 40 CFR §60.44(e) (which is equivalent to Special Condition C.1.a.iv) or Special Condition C.1.b.ii (which, as discussed above, does not specify an emission limit and therefore appears to be a typographical error). Boiler 3 is required to comply with either the nitrogen oxides emission in Table 1 or with the alternate emission limit under Special Condition C.1.a.iv (equivalent to that specified in §60.44(e)). Therefore, there is no condition under which the permittee could elect not to comply with Table 1, or 40 CFR §60.44(e). Thus, as written, the three-hour averaging period would never apply for the purposes of defining excess emissions of nitrogen oxides (in reality, it is anticipated that HC&S will comply with the nitrogen oxides emission limit in Table 1 and that excess emissions will in fact be determined using the three-hour averaging period).

As written, the proposed special conditions does not appear to be consistent with 40 CFR §60.45(g)(3) and it is unclear when, if ever, the three-hour averaging period would apply. HC&S recommends that the Department revise these special conditions for clarity and for consistency with 40 CFR §60.45(g)(3).

HDOH Response:

Attachment IIA. Special Condition F.12.e.v.(3) is revised for consistency with 40 CFR § 60.45(g)(3).

NN. Comment:

Attachment IIA, Special Condition F.12

The proposed Special Condition F.12.e.v.(5) defines excess emissions if a CEMS for oxygen or carbon dioxide is installed as an operating day period when the arithmetic average of all operating one-hour periods exceeds the applicable standards of Special Condition E.9. and E.9.b. It is unclear what the purpose of this provision is, since there are no "applicable standards" identified in Special Conditions E.9.a. or E.9.b; these conditions merely specify the procedures for converting continuous monitoring data into units of the applicable standards. Moreover, there are no emissions limits for oxygen or carbon dioxide. HC&S therefore recommends that this condition be deleted from the permit.

HDOH Response:

Attachment IIA.F.12.e.v.(5) has been deleted.

OO. Comment:

Attachment IIB , Section A, Equipment Description

The equipment listed does not include the 66 hp emergency diesel engine generator located at the Paia Sugar Mill. It is our understanding that this engine is subject to the Stationary RICE NESHAP.

HDOH Response:

The 66 hp diesel engine generator has been added to Attachment IIB., Section A.1.c.v.

PP. Comment:

Attachment IIB, Special Condition C.2.

The proposed Special Condition specifies operating requirements applicable to the Dietz 113 hp diesel engine during startup. It is our understanding that under 40 CFR Part 63, Subpart ZZZZ, this condition applies to all the engines listed under Section A.

HDOH Response:

Attachment IIB, Special Condition C.2 has been revised to indicate that all of the diesel engines listed in Section A are subject to the condition.

QQ. Comment:

Attachment IIB, Special Condition C.8, Visible Emissions

The proposed condition includes a reference to "Stack 2". Since Stack 2 serves Puunene Mill Boiler 3 while the proposed condition refers to opacity of emissions from diesel engines, this appears to be a typographical error and should be corrected.

HDOH Response:

"Stack 2" has been removed from the permit condition.

RR. Comment:

Attachment IIB. Section D, Monitoring and Recordkeeping Requirements

The proposed Special Condition D.4 requires that the permittee "shall monitor continuously at all times that the Deutz 113 hp diesel irrigation pump and the Deutz 99 hp diesel engine irrigation pump are operating". The permit does not specify what monitoring is required for these engines, nor are any continuous monitoring requirements specified for these engines in 40 CFR Part 63, Subpart ZZZZ. HC&S requests that this condition be clarified to identify what specific monitoring, if any, is required for these engines.

HDOH Response:

Attachment IIB. D.4. and D.5. do not apply to the Deutz 113 hp diesel engine irrigation pump and the Deutz 99 hp diesel engine irrigation pump. D.4 and D.5. have been deleted.

SS. Comment:

Attachment IIB, Section E, Notification and Reporting Requirements

The proposed Special Condition E.4 requires semiannual submittal of the Monitoring Report Form Changing Oil: Diesel Engines and Diesel Engine Generators. The form requires reporting of total operating hours each month and hours of operation since changing oil, as well as fuel data. While not explicitly stated in the permit, it is presumed that this form must be submitted for each diesel engine listed in Section A. However, Special Condition D.3 requires the installation of a non-resetting hour meter only on emergency diesel engines and diesel engine generators; it does not require hour meters to be installed on the Deutz diesel pumps.

Since an hour meter would be required in order to generate the information necessary to complete the Monitoring Report Form, HC&S request clarification in the permit as to: (1) whether the Monitoring Report Form Changing Oil: Diesel Engines and Diesel Engine Generators must be submitted for only emergency diesel engines and emergency diesel engine generators for which installation of an hour meter is required;

or (2) whether an hour meter is required to be installed on all diesel engines, not just those specified in Special Condition D.3.

HDOH Response:

For Attachment IIB.D.3 “emergency” and “c” have been deleted. The condition now requires all diesel engine generators in Attachment IIB to be equipped with a non-resetting meter.

TT. Comment:

Monitoring/Annual Emissions Report Form, Boilers 1 and 2 Bagasse

The proposed form requires reporting of the maximum sulfur content by weight of bagasse. Bagasse is known to have a negligible sulfur content well below 0.5 percent by weight and is therefore not typically analyzed for sulfur content except during annual stack testing. Moreover, there is no condition in the permit requiring bagasse to be analyzed for sulfur content. HC&S therefore request that the requirement to report the maximum sulfur content of bagasse on the annual emissions report form be deleted.

HDOH Response:

The requirement to report the Maximum % Sulfur Content by Weight and Date Received for bagasse is removed from the Monitoring/Annual Emissions Report Form Boilers 1 and 2 Bagasse.

UU. Comment:

Monitoring/Annual Emissions Report Form, Boilers 1 and 2 Coal

The proposed form incorrectly specifies the rolling 12-month coal consumption limit for Boilers 1 and 2 as 62,606 tons.

HDOH Response:

The Monitoring/Annual Emissions Report Form Boilers 1 and 2 Coal has been corrected to 54,680 tons.

IV. COMMENTS NOT PERTAINING TO THE DRAFT PERMIT

A. Comment:

Many comments were received stating the practice of sugar cane burning should be stopped.

HDOH Response:

The burning of sugar cane is not regulated through the covered source permitting process. The covered source permit pertains to the operation of the boilers and other fuel burning equipment located at the Puunene Mill.

B. Comment:

Many of the comments received were general in nature with comments of no specificity on the permit review, permit conditions, or compliance with the applicable state and federal air regulations. Responses are not provided for these comments.